

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Case No. 23-08514
Rais Uddin,) Honorable A. Benjamin Goldgar
Bijal A. Brahmbhatt,)
Debtors.) Chapter 13
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)

OBJECTION TO CONFIRMATION OF PLAN

COMES NOW TD Bank, N.A., successor in interest to TD Auto Finance LLC ("TD Bank"), a creditor in this case and objects to confirmation of the Plan filed by Debtors, on the following grounds:

1. TD Bank is a creditor of a Debtors with respect to a debt secured by a 2016 Ford Fusion.
2. Part 3.1 of Debtors' Plan provides for TD Bank to be paid directly.
3. However, the Plan does not provide for curing the prepetition arrears in the amount of \$3,094.53.
4. If the Debtors are to pay said arrears directly, then the language in part 8.1 needs to be adjusted to make it clear that the Debtors are the disbursing agent for both the pre-petition as well as the post-petition payments. Otherwise, the Plan would need to provide for the payment of the arrears, with interest and a prompt cure.

WHEREFORE, TD Bank respectfully requests that confirmation of the Plan be denied, and for such further relief as is just and proper.

Respectfully submitted,
RIEZMAN BERGER, P.C.

By: /s/ Kathryn A. Klein
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was electronically served using the CM/ECF system to the following on August 15, 2023:

Justin R. Storer
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Attorney for Debtors

Marilyn O. Marshall
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Chicago IL 60604

Chapter 13 Trustee

Office of the United States Trustee
219 S Dearborn St, Room 873
Chicago, IL 60604

I further certify that a copy of the foregoing document was served on the following parties by sending postage prepaid, in the United States Mail, by first-class mail to the following on August 15, 2023:

Rais Uddin
Bijal A. Brahmbhatt
1128 Aimtree Pl.
Schaumburg IL 60194

Debtors

/s/ Kathryn A. Klein